

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 4:19-CV-10520-TSH

CHARU DESAI,
Plaintiff,

v.

UMASS MEMORIAL MEDICAL
CENTER, INC., et al.,
Defendants.

**DEFENDANTS' PROPOSED NEUTRAL
STATEMENT TO BE READ TO THE
JURY AT THE START OF THE TRIAL**

Defendants, UMass Memorial Medical Group, Inc., and Max Rosen, M.D., submit the following succinct, proposed neutral statement to be read to the jury at the start of trial:

“Plaintiff, Dr. Charu Desai, a former employee of UMass Memorial Medical Group, alleges that her employment was terminated because of her age. In addition, Dr. Desai claims that the Chair of the Department of Radiology, Dr. Max Rosen, aided and abetted UMass Memorial Medical Group in alleged age discrimination by interfering with her contractual relationship with UMass Memorial Medical Group when he decided to terminate her employment. UMass Memorial Medical Group and Dr. Rosen deny Dr. Desai’s allegations and assert that Dr. Desai’s employment was terminated based on patient-safety concerns following repeated complaints as to the quality of Dr. Desai’s radiological reads.”

Respectfully submitted,

**UMASS MEMORIAL MEDICAL
GROUP, INC. and MAX ROSEN, M.D.**

By their attorneys,

/s/ Robert L. Kilroy

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Dated: November 22, 2022

CERTIFICATE OF SERVICE

I, Robert L. Kilroy, hereby certify that this document, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this day.

/s/Robert L. Kilroy

Robert L. Kilroy, Esq.

Dated: November 22, 2022